

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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June 27, 2023

**BY ECF**

Honorable Mary Kay Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
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**Re: United States v. Massiel Encarnacion-Velez,  
21 Cr. 225 (MKV)**

Dear Judge Vyskocil:

I write to request that the Court adjourn by 90 days Ms. Encarnacion-Velez's voluntary surrender date, which is currently set for July 24, 2023. The requested adjournment is necessary for the care of Ms. Encarnacion-Velez's baby daughter because (1) she continues to nurse at this time and (2) Fulvio Valdez, Ms. Encarnacion-Velez's partner and her daughter's father, was injured in a car-on-motorcycle accident in May and is recovering only slowly. Mr. Valdez spent approximately three weeks in the hospital and is now in physical therapy.

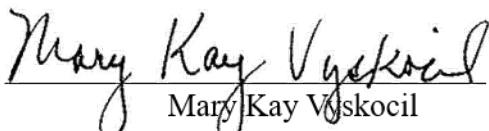
The government has no objection to this request.

Respectfully submitted,  
/s/  
Clay H. Kaminsky  
Assistant Federal Defender  
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CC: AUSA Matthew Shahabian

**Granted. SO ORDERED.**

Date: June 30, 2023  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge